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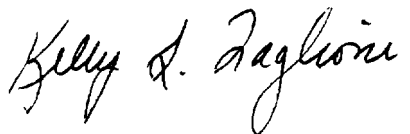
Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Capitol Heights Facility
9300 East Hampton Drive
Capitol Heights, MD 20743

WorldCom, Cox, and AT&T ads. Verizon
CC Docket Nos. 00-218, 00-249, and 00-251

Dear Ms. Salas:

Enclosed please find four copies of Verizon VA's Corrections to WorldCom's Late-Filed Exhibit 52: Responses to Record Requests. Please do not hesitate to call me with any questions.

Sincerely,



Kelly L. Faglioni
Counsel for Verizon

KLF/ar
Enclosures

cc: Dorothy T. Attwood, Chief, Common Carrier Bureau (8 copies) (By Hand)
Jeffery Dygert (w/o enclosure) (by mail)
Katherine Farroba (w/o encl.) (by mail)

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Ms. Magalie R. Salas
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John Stanley (w/o encl.) (by mail)

With enclosures, via email and UPS-Next Day:

Jodie L. Kelley, counsel for WorldCom

Kimberly Wild, counsel for WorldCom

David Levy, counsel for AT&T

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NOV 28 2001

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
Petition of WorldCom, Inc. Pursuant)	
to Section 252(e)(5) of the)	
Communications Act for Expedited)	
Preemption of the Jurisdiction of the)	CC Docket No. 00-218
Virginia State Corporation Commission)	
Regarding Interconnection Disputes)	
with Verizon Virginia Inc., and for)	
Expedited Arbitration)	
)	
In the Matter of)	
Petition of Cox Virginia Telecom, Inc.)	
Pursuant to Section 252(e)(5) of the)	
Communications Act for Preemption)	CC Docket No. 00-249
of the Jurisdiction of the Virginia State)	
Corporation Commission Regarding)	
Interconnection Disputes with Verizon)	
Virginia Inc. and for Arbitration)	
)	
In the Matter of)	
Petition of AT&T Communications of)	
Virginia Inc., Pursuant to Section 252(e)(5))	CC Docket No. 00-251
of the Communications Act for Preemption)	
of the Jurisdiction of the Virginia)	
Corporation Commission Regarding)	
Interconnection Disputes With Verizon)	
Virginia Inc.)	

**VERIZON VIRGINIA INC.'S CORRECTIONS TO
WORLD COM'S LATE-FILED EXHIBIT 52: RESPONSES TO RECORD REQUESTS**

Verizon Virginia Inc. ("Verizon VA") submits the following corrections to WorldCom's Late-Filed Exhibit 52: Responses to Record Requests. As discussed below, two of WorldCom's responses to the Commission's record requests are inaccurate. Because these responses were submitted after the hearing, Verizon VA should be given the opportunity to correct the record. Accordingly, Verizon VA requests that this document be admitted into the record as Verizon VA Exhibit 83.

1. WorldCom Ex. 52, Record Request 4.

WorldCom's response to record request 4, which is related to Issue IV-1 (tandem transit traffic) is as follows:

4. Staff Questions to WorldCom Witnesses Regarding Issue IV-1:
- a. Under WorldCom's proposal does Verizon have recourse for bad debts with 3rd parties?
 - b. Does WorldCom have its proposed arrangement with any other ILEC(s)?
 - c. Has this issue previously been arbitrated by WorldCom, and has WorldCom won this issue in other arbitrations?

WorldCom Response:

- a. If Verizon is unable to collect the reciprocal compensation which is owed from the originating third party carrier, it would not be liable to provide the reciprocal compensation to WorldCom. Thus, Verizon would not ultimately be liable for the reciprocal compensation.
- b. WorldCom's proposed arrangement is in place with BellSouth in Georgia.
- c. The issue has only been arbitrated in the BellSouth region and the Georgia Commission ruled in favor of WorldCom's position.

WorldCom Ex. 52 at 4. WorldCom's responses to subparts (b) and (c) are not accurate with respect to WorldCom's arrangement on tandem transit traffic with BellSouth in Georgia and with respect to a previous ruling of the Georgia Commission.

WorldCom's proposal on tandem transit traffic in this docket would require Verizon VA to carry tandem transit traffic between WorldCom and a third party but would not require WorldCom to have an interconnection agreement with the third-party. In addition, WorldCom proposes that Verizon VA act as the billing and collecting agent between WorldCom and the third-party but WorldCom does not propose to compensate Verizon VA for performing this service. This is not the same as in Georgia. Pursuant to the order of the Georgia Commission, the originating and terminating carriers are required to have interconnection agreements, and

BellSouth is entitled to compensation for acting as the billing and collecting agent.¹ Thus, the arrangement reflected in the Georgia Commission's order is not the same as the WorldCom proposal in this docket, and the tandem transit traffic arrangement between WorldCom and BellSouth is not the same as proposed in this docket. Verizon VA does not know that the provisions have only been arbitrated in Georgia.

2. WorldCom Exhibit 52, Record Request 8.

WorldCom's response to record request 8 also is inaccurate. The specific Commission request, as framed by WorldCom, and the response follow:

8. Staff Question to WorldCom witness Don Grieco regarding Issue I-1:

In what states of the BellSouth region does WorldCom have an arrangement providing for interconnecting at a single tandem for termination throughout the LATA?

WorldCom Response:

WorldCom and BellSouth have agreed to this arrangement throughout the entire BellSouth region and have implemented it already in Georgia.

WorldCom Ex. 52 at 6.

Verizon VA has reasons to believe that, contrary to WorldCom's response, WorldCom and BellSouth have not agreed to the "arrangement" either in Georgia or throughout the

¹ *In re: Petition of MCI Metro Access Transmission Services, LLC and MCI WorldCom Communications, Inc. for Arbitration of Certain Terms and Conditions of Proposed Agreement with BellSouth Telecommunications, Inc. Concerning Interconnection and Resale Under the Telecommunications Act of 1996*, Order at 14, Docket No. 11901-U (Ga. PSC March 7, 2001).

The Commission finds that the Agreement shall include the language proposed by MCIW, with the modification that the provision must state that the originating and terminating carriers must have an interconnection agreement, and that BellSouth would not have to render payment to the terminating carrier when the originating carrier failed to pay. Also, the language shall state that BellSouth is entitled to compensation for providing the [billing and collecting] service.

BellSouth footprint. This issue was actively litigated in Georgia; there was no agreement.² In addition, at the time WorldCom filed its record request responses in this proceeding, BellSouth and WorldCom had not submitted a final interconnection agreement for approval with the Georgia Commission. It is therefore not clear that any “arrangement” had been implemented.³ Moreover, based on BellSouth’s litigation position in the generic docket in Georgia, Verizon VA doubts that BellSouth and WorldCom have agreed to this arrangement throughout the entire BellSouth region. Indeed, Verizon VA has been unable to obtain any evidence of that fact.

3. **Conclusion**

For the reasons set forth above, Verizon VA submits that two of WorldCom’s record responses are not completely accurate. To correct the record in this proceeding, Verizon VA requests that this document be accepted into the record as Verizon Exhibit 83.

² See *In re: Generic Proceeding on Point of Interconnection and Virtual FX Issues*, Final Order, Docket No. 13542-N (Ga. PSC July 23, 2001).

³ BellSouth filed with the Georgia Public Service Commission on November 13, 2001 a request for approval of an interconnection agreement with WorldCom. Verizon VA does not believe that the Georgia Commission has ruled on this request.

Respectfully submitted,

Kelly L. Faglioni

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Dated: November 28, 2001

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Attorneys for Verizon VA

CERTIFICATE OF SERVICE

I do hereby certify that the foregoing Verizon Virginia Inc.'s Objections to WorldCom's Late-Filed Exhibit 52: Responses to Record Requests was sent as follows this 28th day of November, 2001 by e-mail and overnight, express delivery:

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